

UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : NO. 24-03264-HWV
Irene Papoutsis Mulkerin :
Debtor : Chapter 7

TRUSTEE'S MOTION FOR APPROVAL TO
MAKE INTERIM DISBURSEMENT TO DEBTOR OF
\$150,000.00 OF SURPLUS FUNDS

AND NOW, comes the Trustee, by his attorney, Steven M. Carr, Esquire, of the law firm of Ream, Carr, Markey & Woloshin, LLP, and files this Motion to Compromise Claim of which the following is a statement:

1. Movant is the duly appointed Trustee in the above-captioned Bankruptcy.
2. On June 3, 2025, the court approved Trustee's Motion to Compromise a claim for \$3,150,000.00.
3. As of the date of the filing of this Motion, Trustee has not received the settlement proceeds.
4. Based upon Debtor's schedules and claims filed, it appears that there will be a surplus that will be paid to the Debtor at the time of final distribution by the Trustee.
5. Debtor has repeatedly asserted throughout the case that she is in severe financial distress.
6. Debtor has asked Trustee to make an interim distribution to her of \$150,000.00 in order to help alleviate her financial distress.
7. Although interim distributions are not common, Trustee finds the Debtor's request to be reasonable and believes that making an interim distribution limited to \$150,000.00 does not threaten the rights of creditors to be paid in full with interest.

WHEREFORE, Trustee prays that the Court authorize him to make an interim distribution to Debtor in the sum of \$150,000.00 after he receives the settlement proceeds from the Compromise.

Ream, Carr, Markey Woloshin & Hunter, LLP

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